

David A. Carroll, Esq. (NSB #7643)
dcarroll@rrsc-law.com

Anthony J. DiRaimondo, Esq. (NSB #10875)
adiraimondo@rrsc-law.com

Robert E. Opdyke, Esq. (NSB #12841)
ropdyke@rrsc-law.com

RICE REUTHER SULLIVAN & CARROLL, LLP

3800 Howard Hughes Parkway, Suite 1200

Las Vegas, NV 8916

Tel: (702) 732-9099

Attorneys for Plaintiff/Counterdefendants Basic Water Company SPE 1 LLC; The Landwell Company, L.P.; Basic Water Company, LLC; Basic Remediation Company, LLC; and Basic Management, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BASIC WATER COMPANY SPE 1 LLC, a Nevada limited-liability company,

Case No. 2:21-cv-01663-RFB-DJA

Plaintiff,
vs.

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY
BRIEFS**

SOUTH WEST ENTERPRISE HOLDINGS,
LLC, a Nevada limited-liability company;
ASSURED REAL ESTATE, INC., a Nevada
corporation,

Defendants.

**SOUTH WEST ENTERPRISE HOLDINGS,
LLC, a Nevada limited-liability company,**

Counterclaimant.

VS.

BASIC WATER COMPANY SPE 1 LLC, a Nevada limited liability company; THE LANDWELL COMPANY, L.P., a Delaware limited partnership; BASIC WATER COMPANY, a Nevada corporation; BASIC REMEDIATION COMPANY, LLC, a Nevada limited-liability company; BASIC MANAGEMENT, INC., a Nevada corporation; UNITED STATES OF AMERICA; and DOES I-X.

Counterdefendants

Pursuant to LR IA 6-1, the Parties, by and through their undersigned counsel, stipulate, agree, and hereby request an extension of the current deadline of November 23, 2021 to December 21, 2022, for Plaintiff/Counter-defendant Basic Water Company SPE 1, LLC, Counter-defendant

1 The LandWell Company, L.P., Counter-defendant Basic Water Company, Inc., Counter-defendant
2 Basic Remediation Company, LLC, Counter-defendant Basic Management Inc. ("Basic Water
3 Parties") to file reply briefs in support of their Motion to Dismiss Third Amended Counterclaims
4 for Business Disparagement, Trade Libel, Tortious Interference with Contract, and Civil
5 Conspiracy (ECF No. 4), Motion for Partial Summary Judgment (Liability) for Trespass and
6 Nuisance (ECF No. 5), and Motion for Partial Summary Judgment on South West Enterprise
7 Holdings, LLC's Counterclaim for Slander of Title (First Counterclaim for Relief) (ECF No. 9).
8 This is the first request to extend these deadlines.

9 There is good cause to extend these deadlines based on the amount of time necessary to
10 draft these reply briefs and also in light of the intervening Thanksgiving holiday. All Parties are in
11 agreement to the extension. This stipulation is submitted in good faith, is not interposed for delay,
12 and is not filed for an improper purpose.

13 Based on the forgoing, the Parties submit that good cause exists to grant this stipulation to
14 extend the deadlines to file reply briefs to the above-refenced motions to December 21, 2021.

15 Dated this 22nd day of November, 2021.

Dated this 22nd day of November, 2021.

16 RICE REUTHER SULLIVAN & CARROLL,
17 LLP

18 By: /s/ Anthony J. DiRaimondo

19 DAVID A. CARROLL, ESQ. (#7643)
20 ANTHONY J. DIRAIMONDO, ESQ.
(#10875)
21 ROBERT E. OPDYKE, ESQ. (#12841)
3800 Howard Hughes Parkway, Suite 1200
22 Las Vegas, NV 89169

23 -and-

24 KAREN A. PETERSON, ESQ. (NSB #366)
25 ALLISON MACKENZIE, LTD.
402 N. Division Street
26 P.O. Box 646
Carson City, Nevada 89702

By: /s/ Rachel Kent

NICHOLAS A. TRUTANICH, ESQ.
(#13644)
United States Attorney - District of
Nevada
RACHEL KENT, ESQ. (# 11795)
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101

Attorneys for Defendants United States of
America

28 *Attorneys for Basic Water Parties*

1
2 Dated this 22nd day of November, 2021.
3

4 ARMSTRONG TEASDALE LLP
5

6 By: /s/ Michelle D. Alarie
7 JEFFREY F. BARR, ESQ. (#7269)
MICHELLE D. ALARIE, ESQ. (#11894)
3770 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169

8 *Attorneys for South West Enterprise Holdings LLC*
9 *and Assured Real Estate Inc.*

10

11 **ORDER**

12

The foregoing Stipulation is GRANTED. The deadlines to file the above-referenced reply
13 briefs are extended to December 21, 2021.

14

15 **IT IS SO ORDERED.**

16

17

18 
RICHARD E. BOULWARE, II
United States District Court
19 DATED this 23rd day of November, 2021.
20
21
22
23
24
25
26
27
28